

## Appendix A: Comparison of Proposed Measures

**Measurement:**    Average Interval for Held Orders

**Reference:**        II.D. Held Order Measurement

	Comparison		VARIATIONS
Measurement Name	Average Interval for Held Orders	Average Interval for Past Due Orders	
Calculation	$\frac{[\sum[(\text{Reporting Period Close Date}) - (\text{Completion Date on FOC})]]}{\text{Number of Held Orders for Reporting Period}}$	(The Number of Days from Due Date to Completion on all Orders that were Completed after the Original Assigned Due Date)/The Total Number of Orders Past Due for that Reporting Period	<ul style="list-style-type: none"> <li>Ameritech calculates delay days on past due orders rather than on held orders.</li> </ul>
Exclusions and/or Inclusions	<b>Exclusions:</b> <ul style="list-style-type: none"> <li>Orders cancelled by competing carrier</li> <li>Order activities of incumbent LEC that are associated with its internal or administrative use of local services</li> </ul>	<b>Proposed exclusions:</b> <ul style="list-style-type: none"> <li>Orders cancelled by competing carrier</li> <li>Order activities of incumbent LEC that are associated with its internal or administrative use of local services</li> </ul> <b>Proposed inclusions:</b> <ul style="list-style-type: none"> <li>Weekends and holidays are included in past day counts.</li> </ul>	<ul style="list-style-type: none"> <li>Ameritech proposes additional inclusions and exclusions as stated in the previous column.</li> </ul>
Categories (Wholesale)	<ul style="list-style-type: none"> <li>Resale Residential POTS               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>Resale Business POTS               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>Resale Specials               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>Unbundled Loops               <ul style="list-style-type: none"> <li>- W/ interim number portability (INP)</li> <li>- W/o INP</li> </ul> </li> <li>Unbundled Switching</li> <li>Unbundled Local Transport</li> <li>Combinations of UNEs               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>Interconnection Trunks</li> </ul>	<ul style="list-style-type: none"> <li>Resale:               <ul style="list-style-type: none"> <li>Residence POTS                   <ul style="list-style-type: none"> <li>- Field Visit</li> <li>- Non-Field Visit</li> </ul> </li> <li>Business POTS                   <ul style="list-style-type: none"> <li>- Field Visit</li> <li>- Non-Field Visit</li> </ul> </li> <li>Centrex                   <ul style="list-style-type: none"> <li>- Field Visit</li> <li>- Non-Field Visit</li> </ul> </li> <li>Specials</li> </ul> </li> <li>Unbundled Loops</li> <li>Unbundled Switching</li> <li>Unbundled Transport</li> <li>Interconnect Trunks</li> </ul>	<ul style="list-style-type: none"> <li>Ameritech does not categorize the measure based on INP.</li> <li>Ameritech does not categorize based on Combination of UNEs.</li> <li>Ameritech categorizes based on Field Visit/Non-Field Visit rather than on Dispatch/Non-Dispatch.</li> <li>Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> </ul>
Categories (Retail)	<ul style="list-style-type: none"> <li>Retail Residential POTS               <ul style="list-style-type: none"> <li>- Dispatch</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Retail:               <ul style="list-style-type: none"> <li>Residence POTS</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Ameritech categorizes based on Field Visit/Non-Field Visit rather than on Dispatch/Non-Dispatch.</li> </ul>

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	<ul style="list-style-type: none"><li>- Non- Dispatch</li><li>▪ Retail Business POTS</li><li>- Dispatch</li><li>- Non- Dispatch</li><li>▪ Retail Specials</li><li>- Dispatch</li><li>- Non- Dispatch</li></ul>	<ul style="list-style-type: none"><li>▪ Field Visit</li><li>▪ Non-Field Visit</li><li>▪ Business POTS</li><li>▪ Field Visit</li><li>▪ Non-Field Visit</li><li>▪ Centrex</li><li>▪ Field Visit</li><li>▪ Non-Field Visit</li><li>▪ Specials</li></ul>	<ul style="list-style-type: none"><li>▪ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li></ul>
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## Appendix A: Comparison of Proposed Measures

**Measurement:** Percentage of Troubles in 30 days for New Orders

**Reference:** I.I.E. Installation Troubles Measurement

	<b>Comcast</b>	<b>Ameritech</b>	<b>VARIATIONS</b>
Measurement Name	Percentage of Troubles in 30 days for New Orders	Installation Trouble Reports (New Service Failures)	
Calculation	[New Service Orders Receiving Trouble Reports ? 30 Days of Order Completion/Number of New Service Orders Completed in Month] X 100	(Number of Trouble Reports Received on Service Orders Within 30 After Completion/Total Number of Orders Completed) *100	
Exclusions and/or Inclusions	<ul style="list-style-type: none"> <li>None</li> </ul>	<p>Proposed exclusions:</p> <ul style="list-style-type: none"> <li>Change (C) orders that are generated as a result of a repair visit</li> </ul> <p>Proposed inclusions</p> <ul style="list-style-type: none"> <li>N, T, C orders only</li> <li>Trouble reports referencing "Found Network Trouble" codes, i.e.:                             <ul style="list-style-type: none"> <li>Regulated Wire and Equipment (Code 03)</li> <li>Outside Plant (Code 04)</li> <li>Central Office (Code 05) (Not</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Ameritech proposes additional inclusions and exclusions as stated in the previous column.</li> </ul>
Categories (Wholesale)	<ul style="list-style-type: none"> <li>Resale Residential POTS                             <ul style="list-style-type: none"> <li>Dispatch</li> <li>Non- Dispatch</li> </ul> </li> <li>Resale Business POTS                             <ul style="list-style-type: none"> <li>Dispatch</li> <li>Non- Dispatch</li> </ul> </li> <li>Resale Specials                             <ul style="list-style-type: none"> <li>Dispatch</li> <li>Non- Dispatch</li> </ul> </li> <li>Unbundled Loops                             <ul style="list-style-type: none"> <li>W/ interim number portability (INP)</li> <li>W/o INP</li> </ul> </li> <li>Unbundled Switching</li> <li>Unbundled Local Transport</li> <li>Combinations of UNEs                             <ul style="list-style-type: none"> <li>Dispatch</li> <li>Non- Dispatch</li> </ul> </li> <li>Interconnection Trunks</li> </ul>	<ul style="list-style-type: none"> <li>Resale:                             <ul style="list-style-type: none"> <li>Residential POTS:                                     <ul style="list-style-type: none"> <li>Regulated Wire and Equipment (Code 03)</li> <li>Outside Plant (Code 04)</li> <li>Central Office (Code 05)</li> </ul> </li> <li>Business POTS:                                     <ul style="list-style-type: none"> <li>Regulated Wire and Equipment (Code 03)</li> <li>Outside Plant (Code 04)</li> <li>Central Office (Code 05)</li> </ul> </li> <li>Centrex                                     <ul style="list-style-type: none"> <li>Regulated Wire and Equipment (Code 03)</li> <li>Outside Plant (Code 04)</li> <li>Central Office (Code 05)</li> </ul> </li> <li>Specials</li> </ul> </li> <li>Unbundled Loops:</li> </ul>	<ul style="list-style-type: none"> <li>Ameritech categorizes Resale based on disposition codes, as this is where the greatest performance variation is seen and, thus, is a better indication of parity.</li> <li>Ameritech does not categorize based on INP.</li> <li>Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> <li>Ameritech does not categorize based on Combination of UNEs.</li> <li>Ameritech does not categorize based on Interconnection Trunks.</li> </ul>

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		<ul style="list-style-type: none"> <li>▪ Unbundled Switching</li> <li>▪ Unbundled Transport</li> </ul>	
Categories (Retail)	<ul style="list-style-type: none"> <li>▪ Retail Residential POTS                             <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Retail Business POTS                             <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Retail Specials                             <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Retail:                             <ul style="list-style-type: none"> <li>▪ Residential POTS:                                     <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Business POTS:                                     <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Centrex                                     <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> </ul> </li> <li>▪ Specials</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech categorizes Retail based on disposition codes.</li> <li>▪ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> </ul>

## Appendix A: Comparison of Proposed Measures

**Measurement:** Percentage of Order Flow Through

**Reference:** II.F. Order Quality Measurements

Measurement Name	Percentage of Order Flow Through	Percent of Electronic Processing	
Calculation	[Number of Orders Electronically Processed Through the Gateway and Accepted Into the Incumbent LEC's Legacy Systems Without Manual Intervention/Number of Orders Submitted in Reporting Period] x 100	(Number of Electronically Received Orders That Are Electronically Processed / Total Number of Valid Orders Received Electronically) * 100	<ul style="list-style-type: none"> <li>Ameritech calculates this measure for electronically-received orders.</li> </ul>
Exclusions and/or Inclusions	Exclusions: <ul style="list-style-type: none"> <li>Rejected orders</li> </ul>	Proposed exclusions: <ul style="list-style-type: none"> <li>Rejected orders</li> </ul> Proposed inclusions: <ul style="list-style-type: none"> <li>Valid orders only</li> </ul>	<ul style="list-style-type: none"> <li>No variation</li> </ul>
Categories (Wholesale)	<ul style="list-style-type: none"> <li>Resale POTS</li> <li>Resale Specials</li> <li>UNEs</li> <li>UNE Combinations</li> </ul>	<ul style="list-style-type: none"> <li>Resale POTS</li> <li>Resale Centrex</li> <li>Resale Specials</li> <li>UNEs (excluding Unbundled Transport and EOI)</li> </ul>	<ul style="list-style-type: none"> <li>Ameritech does not categorize based on Combination of UNEs.</li> <li>Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> <li>Ameritech UNE measure will exclude EOI and Unbundled Transport.</li> </ul>
Categories (Retail)	<ul style="list-style-type: none"> <li>Retail POTS</li> <li>Retail Specials</li> </ul>	<ul style="list-style-type: none"> <li>Retail POTS</li> <li>Retail Centrex</li> <li>Retail Specials</li> <li>Ameritech uses win-back performance as a retail analog.</li> </ul>	<ul style="list-style-type: none"> <li>Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> <li>Ameritech uses win-back performance as a retail analog.</li> </ul>

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**Measurement:** Percentage of Rejected Orders

**Reference:** ILF. Order Quality Measurements

	Commission	Ameritech	VARIATIONS
Measurement Name	Percentage of Rejected Orders	Service Order Accuracy (Electronically Received Order Quality)	
Calculation	[Number of Orders Rejected Due to Error or Omission/Number of Orders Submitted in Reporting Period] x 100	(Number of Electronically Received Orders Electronically or Manually Rejected/Total Number of Orders Received Electronically) * 100	Ameritech is assuming that Non-electronic/ASR orders are excluded.
Exclusions and/or Inclusions	<ul style="list-style-type: none"> <li>None</li> </ul>	Proposed inclusions: <ul style="list-style-type: none"> <li>The measure is calculated for electronically received orders only.</li> </ul>	<ul style="list-style-type: none"> <li>Ameritech proposes additional inclusions as stated in the previous column.</li> <li>Ameritech UNE measure will exclude EOI and Unbundled Transport since the measure cannot be tracked using the ASR system.</li> </ul>
Categories (Wholesale)	<ul style="list-style-type: none"> <li>Resale POTS</li> <li>Resale Specials</li> <li>UNEs</li> <li>UNE Combinations</li> </ul>	<ul style="list-style-type: none"> <li>Resale POTS</li> <li>Resale Centrex</li> <li>Resale Specials</li> <li>UNEs (excluding Unbundled Transport and EOI)</li> </ul>	<ul style="list-style-type: none"> <li>Ameritech does not categorize based on Combination of UNEs.</li> <li>Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> <li>Ameritech UNE measure will exclude EOI and Unbundled Transport.</li> </ul>
Categories (Retail)	<ul style="list-style-type: none"> <li>Retail POTS</li> <li>Retail Specials</li> </ul>	<ul style="list-style-type: none"> <li>Retail POTS</li> <li>Retail Centrex</li> <li>Retail Specials</li> <li>Ameritech uses win-back performance as a retail analog.</li> </ul>	<ul style="list-style-type: none"> <li>Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> <li>Ameritech uses win-back performance as a retail analog.</li> </ul>

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**Measurement:**    Average Submissions per Order

**Reference:**        II.F. Order Quality Measurements

Measurement Name	Average Submissions per Order	Ameritech does not concur with the current measure. Should the NPRM require the measurement, an alternative measure has been proposed	Ameritech proposes an alternative measure to the NPRM's "Average Submissions per Order."
Calculation	$\frac{[\sum(\text{Number of Orders Accepted for Provisioning}) + (\text{Number of Orders Rejected})]}{\text{Number of Orders Accepted for Provisioning in Reporting Period}}$	Total Number of Orders that were Accepted for Provisioning in the Period / (Number of Orders Accepted for Provisioning – Number of Orders Resubmitted)	The NPRM calculation uses "Rejected Orders," while Ameritech measures "Orders Resubmitted."
Exclusions and/or Inclusions	<ul style="list-style-type: none"> <li>▪ None</li> </ul>	<ul style="list-style-type: none"> <li>▪ Multiple resubmits of the same order will be counted in "Number of Orders Resubmitted"</li> </ul>	<ul style="list-style-type: none"> <li>▪ No variation</li> </ul>
Categories (Wholesale)	<ul style="list-style-type: none"> <li>▪ Resale POTS</li> <li>▪ Resale Specials</li> <li>▪ UNEs</li> <li>▪ UNE Combinations</li> </ul>	<ul style="list-style-type: none"> <li>▪ Resale POTS</li> <li>▪ Resale Centrex</li> <li>▪ Resale Specials</li> <li>▪ UNEs (excluding Unbundled Transport and EOI)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech does not categorize based on Combination of UNEs.</li> <li>▪ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> <li>▪ Ameritech UNE measure will exclude EOI and Unbundled Transport.</li> </ul>
Categories (Retail)	<ul style="list-style-type: none"> <li>▪ Retail POTS</li> <li>▪ Retail Specials</li> </ul>	<ul style="list-style-type: none"> <li>▪ Retail POTS</li> <li>▪ Retail Centrex</li> <li>▪ Retail Specials</li> <li>▪ Ameritech uses win-back performance as a retail analog.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> <li>▪ Ameritech uses win-back performance as a retail analog.</li> </ul>

## Appendix A: Comparison of Proposed Measures

**Measurement:**    Percentage of Accurate 911 and E911 Database Updates

**Reference:**        ILG. 911 Database Update and Accuracy

	Commission	Ameritech	VARIATIONS
Measurement Name	Percentage of Accurate 911 and E911 Database Updates	No Ameritech measure is proposed.	
Calculation	[Number of Database Updates Completed Without Error During Reporting Period/Total Number of Updates Completed During Reporting Period] x 100		
Exclusions and/or Inclusions	<ul style="list-style-type: none"> <li>▪ None</li> </ul>		
Categories (Wholesale)	<ul style="list-style-type: none"> <li>▪ All Competing Carrier customer records</li> </ul>		
Categories (Retail)	<ul style="list-style-type: none"> <li>▪ All Incumbent LEC customer records</li> </ul>		



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**Measurement:** Percentage of Missed Due Dates for 911 and E911 Database Updates OR Average Time to Update 911 and E911 Databases

**Reference:** II.G. 911 Database Update and Accuracy

	Commission	Ameritech	VARIATIONS
Measurement Name	Percentage of Missed Due Dates for 911 and E911 Database Updates  OR  Average Time to Update 911 and E911 Databases	Customer Record Update Files Not Processed by the Next Business Day (Received Electronically)  Mean Time To Process Customer Record Update Files (Received Electronically)	Ameritech has separate measures for files received electronically and manually while the NPRM does not distinguish between the two.
Calculation	[Number of Updates Completed by Committed Due Date During Reporting Period/Total Number of Updates Scheduled to be Completed During Reporting Period] x 100  OR  [Σ[(Completion Date & Time)-(Update Submission Date & Time)]]/Total Number of Updates Completed in Reporting Period	[(Number of Electronically Received CRU Files Not Processed by the Next Business Day) / (Total Number of Electronically Received CRU Files)] * 100  {Σ[(Date and Time Electronic CRU File Processed) - (Date and Time CRU File Electronically Received)]} / Total Number of Electronically Received CRU Files	<ul style="list-style-type: none"> <li>NPRM refers to the number of updates while Ameritech refers to the number of update files.</li> <li>It is important to note that time required to process 911 and E911 updates is influenced by many factors that are not within control of the <i>Incumbent LEC</i>.</li> </ul>
Exclusions and/or Inclusions	<ul style="list-style-type: none"> <li>None</li> </ul>	<p>Proposed inclusions:</p> <ul style="list-style-type: none"> <li>The measure includes electronically received files only.</li> <li>Ameritech processes updates electronically 24 hours a day, 5 days a week, excluding holidays and weekends.</li> <li>Ameritech includes Non-business hours during the week in its reports, but excludes weekends. However, the time of day does impact the time required to process the update file. For example, during Non-business hours (5:00 p.m. – 8:00 a.m.) all of the systems are used to generate daily statistics reports (e.g., error reports, customer reports, back-up files, ...).</li> <li>The user report normally reflects Non-business hours during the week,</li> </ul>	<ul style="list-style-type: none"> <li>Ameritech currently <i>does</i> include weekends in calculating processing times for reporting. In future months, any files received on the weekends will be excluded from the processing times calculation. These files will still be included in the measure "customer record update files not processed within one business day." For this measure, files received on the weekend will be considered received on Monday and must be processed by midnight Tuesday.</li> <li>Ameritech defines business hours for 911 processing as Monday through Friday, 12 a.m. to 11:59 p.m. Although Ameritech processes updates electronically 24 hours per day, 5 days per week, files received in Non-business hours (5 p.m. – 8 a.m.) may not be processed as quickly due to system testing and personnel issues. The only time that files are excluded from the processing time calculation is when they are received on a weekend or holiday.</li> <li>Ameritech's measure excludes any update file submitted by the incumbent LEC or CLEC that contains &gt; or = 25% erred records since significantly erred update files</li> </ul>

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		<p>but provides the option for the incumbent LEC who receives very large files after 3:00 p.m. to deem those files as having been received at 8:00 a.m. on the next day.</p> <ul style="list-style-type: none"> <li>▪ The measure excludes any update file submitted by the incumbent LEC or CLEC that contains &gt; or = 25% erred records.</li> <li>▪ Independent telephone companies are excluded from all 911 performance measures.</li> <li>▪ CLECs that use SCC as a clearinghouse are currently not included in the performance measures since the reporting for these carriers is on a region basis.</li> </ul>	<p>negatively impact Ameritech's ability to process the file.</p> <ul style="list-style-type: none"> <li>▪ Independent telephone companies are excluded from all of Ameritech's 911 performance measures.</li> <li>• CLECs that use SCC as a clearinghouse are currently not included in Ameritech's performance measures since the reporting for these carriers is on a region basis.</li> </ul>
Categories (Wholesale)	<ul style="list-style-type: none"> <li>▪ All Competing Carrier customer records</li> </ul>	<ul style="list-style-type: none"> <li>▪ Competing carrier data includes only facilities based carriers, while Retail data includes Ameritech Retail customers, competing carrier Resale customers, and competing carrier Centrex-Resale customers.</li> </ul>	
Categories (Retail)	<ul style="list-style-type: none"> <li>▪ All Incumbent LEC customer records</li> </ul>	<ul style="list-style-type: none"> <li>▪ Retail and Non-facilities based Telcos (i.e., Resale) are combined in one overall measure and presented as "Retail" performance, as orders for both are sent in the same data file and thus cannot be distinguished by the supporting systems.</li> </ul>	

## Appendix A: Comparison of Proposed Measures

**Measurement:**    Average Time to Restore

**Reference:**        III. Repair and Maintenance

	Competition	Ameritech	VARIATIONS
Measurement Name	Average Time to Restore	Mean Time to Repair	
Calculation	$\frac{[\sum((\text{Date and Time Trouble Ticket Resolution Notification Returned to Competing Carrier}) - (\text{Date and Time Trouble Ticket Logged with Incumbent LEC}))]}{\text{Number of Trouble Tickets Resolved in Reporting Period}}$	(Service Restoral Date and Time on Customer Reported Trouble Tickets – Date and Time	Ameritech measures the time service is restored, while the NPRM uses the time the CLEC is notified.

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Exclusions and/or Inclusions	<p><b>Exclusions:</b></p> <ul style="list-style-type: none"> <li>▪ Trouble tickets that are cancelled by the competing carrier</li> <li>▪ Incumbent LEC trouble reports associated with internal or administrative use of local services</li> <li>▪ Instances where the customer requests a ticket be "held open" for monitoring</li> </ul>	<p><b>Proposed exclusions:</b></p> <ul style="list-style-type: none"> <li>▪ Trouble tickets cancelled by the competing carrier</li> <li>▪ Incumbent LEC trouble reports associated with internal or administrative use of local services</li> <li>▪ Instances where the customer requests a ticket be "held open" for monitoring</li> <li>▪ Delays due to no access or otherwise delayed by the CLEC or end user (For UNE only, this will vary based on individual contractual agreements)</li> <li>▪ Repairs for which the customer selects the date of repair</li> <li>▪ Subsequent trouble reports on open tickets</li> <li>▪ Trouble tickets where testing or investigation determines that there are no problems</li> <li>▪ Trouble tickets involving interexchange carriers, request for information, interconnection trunks (including IXC trunks), and CPE</li> </ul> <p><b>Proposed inclusions:</b></p> <ul style="list-style-type: none"> <li>▪ Customer reported troubles only</li> <li>▪ Trouble reports referencing "Found Network Trouble" codes, i.e.: <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech proposes additional exclusions and inclusions as stated in the previous column.</li> </ul>
Categories (Wholesale)	<ul style="list-style-type: none"> <li>▪ Resale Residential POTS <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Resale Business POTS <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Resale Specials <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Unbundled Loops <ul style="list-style-type: none"> <li>- W/ interim number portability (INP)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ <del>Resale:</del> Outside Plant (Code 04)</li> <li>▪ Residential POTS: <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Business POTS: <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech categorizes Resale based on disposition codes, as this is where the greatest performance variation is seen and, thus, is a better indication of parity.</li> <li>▪ Ameritech does not categorize based on INP.</li> <li>▪ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> <li>▪ Ameritech does not categorize based on Combination of UNEs.</li> <li>▪ Ameritech does not categorize based on Interconnection Trunks.</li> </ul>

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	<ul style="list-style-type: none"> <li>- W/o INP</li> <li>▪ Unbundled Switching</li> <li>▪ Unbundled Local Transport</li> <li>▪ Combinations of UNEs               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Interconnection Trunks</li> </ul>	<ul style="list-style-type: none"> <li>▪ Centrex               <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Specials</li> <li>▪ Unbundled Loops:</li> <li>▪ Unbundled Switching</li> <li>▪ Unbundled Transport</li> </ul>	
Categories (Retail)	<ul style="list-style-type: none"> <li>▪ Retail Residential POTS               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Retail Business POTS               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Retail Specials               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Retail:               <ul style="list-style-type: none"> <li>▪ Residential POTS:                   <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Business POTS:                   <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> </ul> </li> <li>▪ Centrex               <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Specials</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech categorizes Retail based on disposition codes.</li> <li>▪ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> </ul>

## Appendix A: Comparison of Proposed Measures

**Measurement:** Frequency of Troubles in 30-day Period

**Reference:** III. Repair and Maintenance

Measurement Name	Frequency of Troubles in 30-day Period	Trouble Report Rate	
Calculation	[Number of Trouble Tickets Received in a 30-Day Period/ Number of Service Access Lines in Service at End of the Reporting Period] X 100	[Number of Initial Trouble Reports Closed in a 30 Day Period/Number of Service Access Lines (by Product) in Service at the End of the Reporting Period]*100	<ul style="list-style-type: none"> <li>Ameritech recommends that the reporting period be based on the calendar month.</li> <li>Troubles are counted in the period in which they are closed.</li> <li>Ameritech reports on trouble tickets closed rather than trouble tickets received.</li> </ul>
Exclusions and/or Inclusions	<b>Exclusions:</b> <ul style="list-style-type: none"> <li>Trouble tickets that are cancelled by the competing carrier</li> <li>Incumbent LEC trouble reports associated with internal or administrative use of local services</li> <li>Instances where the customer requests a ticket be "held open" for monitoring</li> </ul>	<b>Proposed exclusions:</b> <ul style="list-style-type: none"> <li>Trouble tickets cancelled by the competing carrier</li> <li>Incumbent LEC trouble reports associated with internal or administrative use of local services</li> <li>Instances where the customer requests a ticket be "held open" for monitoring</li> <li>Subsequent trouble reports on open tickets</li> <li>Trouble tickets where testing or investigation determines that there are no problems</li> <li>Trouble tickets involving interexchange carriers, request for information, interconnection trunks (including IXC trunks), and CPE</li> </ul> <b>Proposed inclusions:</b> <ul style="list-style-type: none"> <li>Customer reported troubles only</li> <li>Trouble reports referencing "Found Network Trouble" codes, i.e.:                             <ul style="list-style-type: none"> <li>Regulated Wire and Equipment (Code 03)</li> <li>Outside Plant (Code 04)</li> <li>Central Office (Code 05) (Not applicable to UNE)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Ameritech proposes additional exclusions and inclusions as stated in the previous column.</li> </ul>
Categories	<ul style="list-style-type: none"> <li>Resale Residential POTS</li> </ul>	<ul style="list-style-type: none"> <li>Resale:</li> </ul>	<ul style="list-style-type: none"> <li>Ameritech categorizes Resale based on disposition codes, as</li> </ul>

## Appendix A: Comparison of Proposed Measures

(Wholesale)	<ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> <li>▪ Resale Business POTS               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Resale Specials               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Unbundled Loops               <ul style="list-style-type: none"> <li>- W/ interim number portability (INP)</li> <li>- W/o INP</li> </ul> </li> <li>▪ Unbundled Switching</li> <li>▪ Unbundled Local Transport</li> <li>▪ Combinations of UNEs               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Interconnection Trunks</li> </ul>	<ul style="list-style-type: none"> <li>▪ Residential POTS:               <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Business POTS:               <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Centrex               <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Specials</li> <li>▪ Unbundled Loops:</li> <li>▪ Unbundled Switching</li> <li>▪ Unbundled Transport</li> </ul>	<p>this is where the greatest performance variation is seen and, thus, is a better indication of parity.</p> <ul style="list-style-type: none"> <li>▪ Ameritech does not categorize based on INP.</li> <li>▪ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> <li>▪ Ameritech does not categorize based on Combination of UNEs.</li> <li>▪ Ameritech does not categorize based on Interconnection Trunks.</li> </ul>
Categories (Retail)	<ul style="list-style-type: none"> <li>▪ Retail Residential POTS               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Retail Business POTS               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Retail Specials               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Retail:               <ul style="list-style-type: none"> <li>▪ Residential POTS:                   <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Business POTS:                   <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Centrex                   <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> </ul> </li> <li>▪ Specials</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech categorizes Retail based on disposition codes.</li> <li>▪ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> </ul>

## Appendix A: Comparison of Proposed Measures

**Measurement:** Frequency of Repeat Troubles in a 30-Day Period

**Reference:** III. Repair and Maintenance

	COMPARISON		VARIATION
Measurement Name	Frequency of Repeat Troubles in 30-Day Period	Percent Repeats – Maintenance	
Calculation	[Total Number of Repeat Trouble Reports/Total Number of Trouble Tickets Received in 30-Day Period] X 100	(Number of Repeat Trouble Reports Closed in a 30 Day Period/Total Number of Measured Closed Trouble Reports in the Same 30 Day Period) * 100	Troubles are counted in the period in which they are closed.
Exclusions and/or Inclusions	<p>Exclusions:</p> <ul style="list-style-type: none"> <li>▪ Trouble tickets that are cancelled by the competing carrier</li> <li>▪ Incumbent LEC trouble reports associated with internal or administrative use of local services</li> <li>▪ Instances where the customer requests a ticket be "held open" for monitoring</li> <li>▪ Subsequent trouble reports on maintenance tickets that have not been reported as resolved (or closed)</li> </ul>	<p>Proposed exclusions:</p> <ul style="list-style-type: none"> <li>▪ Trouble tickets cancelled by the competing carrier</li> <li>▪ Incumbent LEC trouble reports associated with internal or administrative use of local services</li> <li>▪ Instances where the customer requests a ticket be "held open" for monitoring</li> <li>▪ Subsequent trouble reports on open tickets</li> <li>▪ Trouble tickets where testing or investigation determines that there are no problems</li> <li>▪ Trouble tickets involving interexchange carriers, request for information, interconnection trunks (including IXC trunks), and CPE</li> </ul> <p>Proposed inclusions:</p> <ul style="list-style-type: none"> <li>▪ Customer reported troubles only</li> <li>▪ Trouble reports referencing "Found Network Trouble" codes, i.e.: <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05) (Not applicable to UNE)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech proposes additional exclusions and inclusions as stated in the previous column.</li> </ul>
Categories (Wholesale)	<ul style="list-style-type: none"> <li>▪ Resale Residential POTS</li> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul>	<p>Resale:</p> <ul style="list-style-type: none"> <li>▪ Residential POTS: <ul style="list-style-type: none"> <li>▪ Regulated Wire and</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech categorizes Resale based on disposition codes, as this is where the greatest performance variation is seen and, thus, is a better indication of parity.</li> </ul>



## Appendix A: Comparison of Proposed Measures

	<ul style="list-style-type: none"> <li>▪ Resale Business POTS               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Resale Specials               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Unbundled Loops               <ul style="list-style-type: none"> <li>- W/ interim number portability (INP)</li> <li>- W/o INP</li> </ul> </li> <li>▪ Unbundled Switching</li> <li>▪ Unbundled Local Transport</li> <li>▪ Combinations of UNEs               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Interconnection Trunks</li> </ul>	<ul style="list-style-type: none"> <li>Equipment (Code 03)               <ul style="list-style-type: none"> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Business POTS:               <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Centrex               <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Specials</li> <li>▪ Unbundled Loops:</li> <li>▪ Unbundled Switching</li> <li>▪ Unbundled Transport</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech does not categorize based on INP.</li> <li>▪ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> <li>▪ Ameritech does not categorize based on Combination of UNEs.</li> <li>▪ Ameritech does not categorize based on Interconnection Trunks.</li> </ul>
Categories (Retail)	<ul style="list-style-type: none"> <li>▪ Retail Residential POTS               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Retail Business POTS               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Retail Specials               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Retail:               <ul style="list-style-type: none"> <li>▪ Residential POTS:                   <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Business POTS:                   <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Centrex                   <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Specials</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech categorizes Retail based on disposition codes.</li> <li>▪ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> </ul>

## Appendix A: Comparison of Proposed Measures

**Measurement:** Percentage of Customer Troubles Resolved within Estimated Time

**Reference:** III. Repair and Maintenance

Measurement Name	Percentage of Customer Troubles Resolved Within Estimated Time	Ameritech proposes the same measure as the NPRM.	Ameritech agrees to add this measure.
Calculation	[Number of Trouble Tickets Resolved by Estimated Date and Time/Number of Trouble Tickets Resolved Within Reporting Period] X 100	Ameritech proposes the same calculation as the NPRM.	
Exclusions and/or Inclusions	<p>Exclusions:</p> <ul style="list-style-type: none"> <li>▪ Trouble tickets that are cancelled by the competing carrier</li> <li>▪ Incumbent LEC trouble reports associated with internal or administrative use of local services</li> <li>▪ Instances where the customer requests a ticket be "held open" for monitoring</li> </ul>	<p>Proposed exclusions:</p> <ul style="list-style-type: none"> <li>▪ Trouble tickets cancelled by the competing carrier</li> <li>▪ Incumbent LEC trouble reports associated with internal or administrative use of local services</li> <li>▪ Instances where the customer requests a ticket be "held open" for monitoring</li> <li>▪ Delays due to no access or otherwise delayed by the CLEC or end user (For UNE only, this will vary based on individual contractual agreements)</li> <li>▪ Repairs for which the customer selects the date of repair</li> <li>▪ Subsequent trouble reports on open tickets</li> <li>▪ Trouble tickets where testing or investigation determines that there are no problems</li> <li>▪ Trouble tickets involving interexchange carriers, request for information, interconnection trunks (including IXC trunks), and CPE</li> <li>▪ Customer troubles referred to other offices</li> </ul> <p>Proposed inclusions:</p> <ul style="list-style-type: none"> <li>▪ Customer reported troubles only</li> <li>▪ Trouble reports referencing "Found Network Trouble" codes, i.e.:</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech proposes additional exclusions and inclusions as stated in the previous column.</li> </ul>

## Appendix A: Comparison of Proposed Measures

		<ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05) (Not applicable to UNE)</li> </ul>	
Categories (Wholesale)	<ul style="list-style-type: none"> <li>▪ Resale Residential POTS               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Resale Business POTS               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Resale Specials               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Unbundled Loops               <ul style="list-style-type: none"> <li>- W/ interim number portability (INP)</li> <li>- W/o INP</li> </ul> </li> <li>▪ Unbundled Switching</li> <li>▪ Unbundled Local Transport</li> <li>▪ Combinations of UNEs               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Interconnection Trunks</li> </ul>	<ul style="list-style-type: none"> <li>▪ Resale:               <ul style="list-style-type: none"> <li>▪ Residential POTS:                   <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Business POTS:                   <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Centrex                   <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Specials</li> </ul> </li> <li>▪ Unbundled Loops:</li> <li>▪ Unbundled Switching</li> <li>▪ Unbundled Transport</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech categorizes Resale based on disposition codes, as this is where the greatest performance variation is seen and, thus, is a better indication of parity.</li> <li>▪ Ameritech does not categorize based on INP.</li> <li>▪ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> <li>▪ Ameritech does not categorize based on Combination of UNEs.</li> <li>▪ Ameritech does not categorize based on Interconnection Trunks.</li> </ul>
Categories (Retail)	<ul style="list-style-type: none"> <li>▪ Retail Residential POTS               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Retail Business POTS               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> <li>▪ Retail Specials               <ul style="list-style-type: none"> <li>- Dispatch</li> <li>- Non- Dispatch</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Retail:               <ul style="list-style-type: none"> <li>▪ Residential POTS:                   <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Business POTS:                   <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> <li>▪ Centrex                   <ul style="list-style-type: none"> <li>▪ Regulated Wire and Equipment (Code 03)</li> <li>▪ Outside Plant (Code 04)</li> <li>▪ Central Office (Code 05)</li> </ul> </li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech categorizes Retail based on disposition codes.</li> <li>▪ Ameritech categorizes based on Centrex AND Specials rather than on Specials only.</li> </ul>

[illegible]

## Appendix A: Comparison of Proposed Measures

**Measurement:** Average Time to Provide Usage Records

**Reference:** IV. Billing

Measurement Name	Average Time to Provide Usage Records	Daily Usage Timeliness (Not Provided on Time)	Ameritech reports a percentage of usage records, while the NPRM calculates the average time to provide records.
Calculation	<p>For competing carriers:  <math display="block">\frac{[\sum[(\text{Date and Time Usage Records Transmitted}) - (\text{Date and Time Usage Records Recorded})]]}{\text{Number of Usage Records Transmitted in Reporting Period}}</math></p> <p>For incumbent LECs:  <math display="block">\frac{[\sum[(\text{Date and Time Usage Records Reformatted to an EMR (or equivalent) format}) - (\text{Date and Time Usage Records Recorded})]]}{\text{Number of Usage Records Transmitted in Reporting Period}}</math></p>	$\frac{(\text{Number of Daily Usage Records Transmitted} > 5 \text{ Days from the Origination Date} / \text{Total Number of Daily Usage Records Transmitted}) * 100}{}$	<p>The NPRM calculates the measure using date and time, while Ameritech proposes that the measure be calculated using days only.</p>
Exclusions and/or Inclusions	<ul style="list-style-type: none"> <li>▪ None</li> </ul>	<p>Proposed exclusions:</p> <ul style="list-style-type: none"> <li>▪ All Sundays and Christmas are excluded from the number of days elapsed</li> </ul> <p>Proposed inclusions:</p> <ul style="list-style-type: none"> <li>▪ All applicable days are determined based on a full 24-hour calendar day</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech proposes additional exclusions and inclusions as stated in the previous column.</li> </ul>
Categories (Wholesale)	<ul style="list-style-type: none"> <li>▪ End user usage records</li> <li>▪ Access usage records</li> <li>▪ Alternately billed usage records</li> </ul>	<ul style="list-style-type: none"> <li>▪ Resale</li> </ul>	<ul style="list-style-type: none"> <li>▪ NPRM proposes categorization by "access usage records" and "alternately billed usage records." Ameritech does not propose this level of categorization due to reasons noted in the body of Ameritech's response to the NPRM.</li> </ul>
Categories (Retail)	<ul style="list-style-type: none"> <li>▪ End user usage records</li> <li>▪ Access usage records</li> <li>▪ Alternately billed usage records</li> </ul>	<ul style="list-style-type: none"> <li>▪ No retail equivalent</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech proposes no retail equivalent</li> </ul>

## Appendix A: Comparison of Proposed Measures

**Measurement:** Average Time to Deliver Invoices

**Reference:** IV. Billing

	Commission	Ameritech	VARIATIONS
Measurement Name	Average Time to Deliver Invoices	AEBS Billing Interval Cycle Time (Resale)  CABS- Bills Delivered Late (UNE)	Ameritech reports a percentage of usage records, while the NPRM calculates the average time to provide records.
Calculation	For competing carriers: $\frac{[\sum((\text{Date and Time Invoices Transmitted}) - (\text{Date and Time Bill Cycle Closes}))]}{\text{Number of Invoices Transmitted during Reporting Period}}$ For incumbent LECs: $\frac{[\sum((\text{Date and Time Invoices Produced in Electronic Format}) - (\text{Date and Time Bill Cycle Closes}))]}{\text{Number of Invoices Produced Electronically during Reporting Period}}$	(Number of AEBS Bills Transmitted > 12 Days from the Scheduled Billing Date / Total Number of AEBS Bills Transmitted) * 100  (Number of CABS Bills Transmitted Over 6 Calendar Days After the Scheduled Billing Date / Total Number of CABS Bills Scheduled for Delivery) * 100	The NPRM calculates the measure using date and time, while Ameritech proposes that the measure be calculated using days only.
Exclusions and/or Inclusions	<ul style="list-style-type: none"> <li>▪ None</li> </ul>	<ul style="list-style-type: none"> <li>▪ None</li> </ul>	<ul style="list-style-type: none"> <li>▪ No variation</li> </ul>
Categories (Wholesale)	<ul style="list-style-type: none"> <li>▪ Wholesale bill invoices</li> <li>▪ Unbundled element bill invoices</li> </ul>	<ul style="list-style-type: none"> <li>▪ Resale</li> <li>▪ UNE</li> </ul>	<ul style="list-style-type: none"> <li>▪ No variation</li> </ul>
Categories (Retail)	<ul style="list-style-type: none"> <li>▪ None</li> </ul>	<ul style="list-style-type: none"> <li>▪ No retail equivalent</li> </ul>	<ul style="list-style-type: none"> <li>▪ No Variation</li> </ul>

## Appendix A: Comparison of Proposed Measures

**Measurement:** Percentage of Time Interface is Available

**Reference:** V. A. Systems Availability Measurement

Measurement Name	Percentage of Time Interface is Available	Percentage of Time Interface is Unavailable	Ameritech reports on system unavailability rather than availability.
Calculation	[Number of Hours OSS Functionality is Available to Competing Carriers During Reporting Period/Number of Hours OSS Functionality was Scheduled to be Available During Reporting Period] x 100	(Amount Of Time The Interface Is Unavailable / Total Scheduled Availability of the Interface)	Ameritech reports on system unavailability rather than availability.
Exclusions and/or Inclusions	▪ None	▪ None	▪ No variation
Categories (Wholesale)	▪ Interface Type - OSS function	▪ Interface type	▪ Ameritech proposes categorization by interface type only.
Categories (Retail)	▪ OSS Function	▪ No retail equivalent	▪ Ameritech does not propose a retail equivalent.

## Appendix A: Comparison of Proposed Measures

**Measurement:** Average Time to Answer Competing Carrier Calls

**Reference:** V. B. Center Responsiveness

	Commission	Ameritech	VARIATIONS
Measurement Name	Average Time to Answer Competing Carrier Calls	Average Speed of Answer – Ordering (in seconds)  Average Speed of Answer – Repair (in seconds)	
Calculation	$\frac{[\sum[(\text{Date and Time of Call Answer}) - (\text{Date and Time of Call Receipt})]]}{\text{Total Calls Answered by Center}}$	$\frac{\{\sum[(\text{Date and Time of Ordering Calls Answer}) - (\text{Date and Time of Ordering Call Receipt})]\}}{\text{Total Number of Ordering Calls Answered}}$  $\frac{\{\sum[(\text{Date and Time of Repair Call Answer}) - (\text{Date and Time of Repair Call Receipt})]\}}{\text{Total Number of Repair Calls Answered}}$	
Exclusions and/or Inclusions	<ul style="list-style-type: none"> <li>▪ None</li> </ul>	Proposed inclusions: <ul style="list-style-type: none"> <li>▪ For a call to be considered answered, an Ameritech representative must handle the TC request</li> </ul>	
Categories (Wholesale)	<ul style="list-style-type: none"> <li>▪ All Competing Carrier Calls</li> </ul>	<ul style="list-style-type: none"> <li>▪ Resale               <ul style="list-style-type: none"> <li>▪ Ordering</li> <li>▪ Repair</li> </ul> </li> <li>▪ UNE               <ul style="list-style-type: none"> <li>▪ Ordering</li> <li>▪ Repair</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Ameritech categorizes by ordering and repair.</li> <li>▪ Ameritech categorizes by resale and UNE.</li> </ul>
Categories (Retail)	<ul style="list-style-type: none"> <li>▪ No Equivalent</li> </ul>	<ul style="list-style-type: none"> <li>▪ No retail equivalent</li> </ul>	<ul style="list-style-type: none"> <li>▪ No variation.</li> </ul>



## Appendix A: Comparison of Proposed Measures

**Measurement:** Average Time to Answer

**Reference:** V. A. OS/DA

	Commission	Ameritech	VARIATION
Measurement Name	Average Time to Answer	Average Speed of Answer (Operator Services)  Average Speed of Answer (Directory Assistance)	
Calculation	$\frac{[\sum[(\text{Date and Time of Response from Incumbent LEC OS/DA database/operator}) - (\text{Date and Time of Call to Incumbent LEC OS/DA database/operator})] / \text{Total Number of Calls to Incumbent LEC OS/DA Database/Operator}]}{1}$	$\frac{\{\sum[(\text{Date and Time of OS Call Answer}) - (\text{Date and Time of OS Call Receipt})]\} / \text{Total Number of OS Calls Answered}}{1}$  $\frac{\{\sum[(\text{Date and Time of DA Call Answer}) - (\text{Date and Time of DA Call Receipt})]\} / \text{Total Number of DA Calls Answered}}{1}$	Ameritech includes the total number of calls answered while the NPRM includes the total number of calls to the incumbent LEC
Exclusions and/or Inclusions	<ul style="list-style-type: none"> <li>None</li> </ul>	Proposed exclusions: <ul style="list-style-type: none"> <li>Calls abandoned prior to answer by an Ameritech OS/DA operator</li> </ul>	<ul style="list-style-type: none"> <li>Ameritech proposes additional exclusions as stated in the previous column.</li> </ul>
Categories (Wholesale)	<ul style="list-style-type: none"> <li>All Competing Carrier Calls</li> </ul>	<ul style="list-style-type: none"> <li>Wholesale and Retail are combined in a single measure, as the systems supporting these functions do not distinguish between the different types of customers</li> </ul>	<ul style="list-style-type: none"> <li>Ameritech is not able to categorize these measures.</li> </ul>
Categories (Retail)	<ul style="list-style-type: none"> <li>All Incumbent LEC Calls</li> </ul>	<ul style="list-style-type: none"> <li>Wholesale and Retail are combined in a single measure, as the systems supporting these functions do not distinguish between the different types of customers</li> </ul>	<ul style="list-style-type: none"> <li>Ameritech is not able to categorize these measures.</li> </ul>